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6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
20 hearing currently scheduled for April 29, 2024, may be continued to June 17, 2024, at 9:00 a.m.

21 The parties have been in active plea negotiations regarding a resolution in this case, and
22 the government has extended a plea agreement in this matter. Counsel for Mr. Ortiz-Padilla has
23 discussed this plea agreement in detail with Mr. Ortiz-Padilla. However, following these
24 discussions, Mr. Ortiz-Padilla required the assistance of an immigration attorney to more fully
25 understand the impact of any plea in this case.

26 Mr. Ortiz-Padilla contacted and began meeting with an immigration attorney in February
27 2024. Mr. Ortiz-Padilla has been in regular contact with this immigration attorney, who is
28 actively answering his questions and working on his behalf. Mr. Ortiz-Padilla's immigration

1 attorney has indicated that she is in need of additional time to properly advise Mr. Ortiz-Padilla
2 regarding his immigration questions. For this reason, Mr. Ortiz-Padilla requires additional time
3 prior to proceeding with the change of plea in this case. As a result, the parties are requesting that
4 this matter be continued to June 17, 2024.

5 The requested continuance is made with the intention of conserving time and resources
6 for both the parties and the Court. The government is in agreement with this request and the
7 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
8 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
9 date of this order through June 17, 2024, for defense preparation and investigation, pursuant to
10 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by
11 resetting the change of plea hearing outweigh the best interest of the public and the defendant in
12 a speedy trial.

13
14 Respectfully submitted,

15 HEATHER E. WILLIAMS
16 Federal Defender

17 Date: April 24, 2024

/s/ Reed Grantham
18 REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
19 SALVADOR ORTIZ-PADILLA

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21 PHILLIP A. TALBERT
United States Attorney

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23 Date: April 24, 2024

/s/ Justin Gilio
24 JUSTIN GILIO
Assistant United States Attorney
25 Attorney for Plaintiff
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ORDER

IT IS SO ORDERED. The change of plea hearing currently set for April 29, 2024, is hereby continued to June 17, 2024, at 9:00 a.m.

The time through June 17, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **April 24, 2024**


UNITED STATES DISTRICT JUDGE